

JONATHAN O. PENA, ESQ.
CA Bar ID No. 278044
Peña & Bromberg, PLC
2440 Tulare St., Suite 320
Fresno, CA 93721
Telephone: 559-412-5390
Fax: 866-282-6709
info@jonathanpena.com
Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Cynthia Laura Hernandez,
Plaintiff,

v.

Kilolo Kijakazi, Acting
Commissioner of Social Security,
Defendant.

Case No. 1:22-cv-00188-BAK(SKO)
STIPULATION AND ORDER FOR
EXTENSION OF TIME
(Doc. 16)

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from August 31, 2022 to October 31, 2022, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. In the months of May through July 21, 2022, Counsel has received an influx of Social Security Certified Administrative Records (CAR). A review of the records received shows

1 Counsel has received at least 50 CARs, the majority of which were filed in June
2 2022.

3 Additionally, for the weeks of August 22, 2022 and August 29, 2022,
4 Counsel currently has 15 merit briefs, and several letter briefs and reply briefs.
5 Additional time is needed to thoroughly brief this matter for the Court.

6 Defendant does not oppose the requested extension. Counsel apologizes to
7 the Defendant and Court for any inconvenience this may cause.

8
9 Respectfully submitted,

10 Dated: August 10, 2022 PENA & BROMBERG, ATTORNEYS AT LAW
11

12 By: /s/ Jonathan Omar Pena
13 JONATHAN OMAR PENA
14 Attorneys for Plaintiff
15

16 Dated: August 10, 2022 PHILLIP A. TALBERT
17 United States Attorney
18 PETER K. THOMPSON
19 Acting Regional Chief Counsel, Region IX
20 Social Security Administration

21 By: */s/ Elizabeth Kathleen Yates Landgraf
22 Elizabeth Kathleen Yates Landgraf
23 Special Assistant United States Attorney
24 Attorneys for Defendant
25 (*As authorized by email on August 10, 2022)
26
27
28

ORDER

Based upon the foregoing stipulation of the parties (Doc. 16), and for good cause shown, Fed. R. Civ. P. 16(b)(4),

IT IS HEREBY ORDERED that Plaintiff shall have an extension of time, to and including October 31, 2022, in which to file Plaintiff's motion for summary judgment. All other deadlines set forth in the Scheduling Order (Doc. 11) shall be extended accordingly.

IT IS SO ORDERED.

Dated: August 11, 2022

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE